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August 22, 2013

BY ECF AND FACSIMILE

Honorable Madeline Cox Arleo, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: **Novartis Pharm. Corp., et al. v. Wockhardt USA LLC, et al.**
Civil Action No: 12 CV 3967 (SDW)(MCA) [Consolidated with Civil Action Nos. 12 CV 4393, 13 CV 1028, and 13 CV 2379]

Dear Judge Arleo:

This firm represents Defendant Hospira, Inc. ("Hospira") in the above-captioned matter. Enclosed please find copies of the following submitted on Hospira's behalf:

1. Declaration of Melissa Steedle Bogad in support of application for admission of counsel *pro hac vice*;
2. Declaration of Peter E. Perkowski; and
3. Proposed form of Order granting admission of counsel *pro hac vice*.

Plaintiffs' counsel has consented to this application and the *pro hac vice* admission of counsel.

If the enclosed proposed form of Order is acceptable to Your Honor, we respectfully request that it be entered.

Respectfully submitted,

s/ Melissa Steedle Bogad

Melissa Steedle Bogad

Enclosures

cc: All Counsel of Record (by email)

WINSTON & STRAWN LLP
The Legal Center
One Riverfront Plaza, Suite 730
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(973) 848-7676
James S. Richter
Melissa Steedle Bogad

Attorneys for Defendant Hospira, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

x
NOVARTIS PHARMACEUTICALS :
CORPORATION, NOVARTIS : Honorable Susan D. Wigenton, U.S.D.J.
CORPORATION, and NOVARTIS AG, :
Plaintiffs, : Civil Action No. 12 CV 3967 (SDW)(MCA)
v. : [Consolidated with Civil Action Nos.
Defendants. : 12 CV 4393, 13 CV 1028, and 13 CV 2379]
WOCKHARDT USA LLC and WOCKHARDT :
LIMITED, : DECLARATION OF MELISSA
Defendants. : STEEDLE BOGAD IN SUPPORT
: OF APPLICATION FOR ADMISSION OF
: COUNSEL *PRO HAC VICE*

x
NOVARTIS PHARMACEUTICALS :
CORPORATION, et al., : Civil Action No. 12 CV 4393
Plaintiffs, :
v. :
SUN PHARMA GLOBAL FZE, et al., :
Defendants. :

x
NOVARTIS PHARMACEUTICALS :
CORPORATION, : Civil Action No. 13 CV 1028
Plaintiff, :
v. :
ACTAVIS LLC, et al., :
Defendants. :

x

NOVARTIS PHARMACEUTICALS	x
CORPORATION,	:
	:
Plaintiff,	:
v.	:
	:
ACCORD HEALTHCARE INC., et al.,	:
	:
Defendants.	:

MELISSA STEEDLE BOGAD, of full age, hereby declares as follows:

1. I am an attorney at law of the State of New Jersey and an associate with Winston & Strawn LLP, attorneys for Defendant Hospira, Inc. ("Hospira").
2. This Declaration is submitted in support of Hospira's application to admit Peter E. Perkowski *pro hac vice* in this matter.
3. I am an associate in Winston & Strawn's Newark, New Jersey office and a member in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.
4. I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will sign all pleadings, briefs, and other papers filed with the Court and will be responsible for said papers and for the conduct of the case. Additionally, I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will be present before the Court during all phases of this proceeding and will be responsible for the conduct of the attorney admitted *pro hac vice*.
5. This firm agrees to abide by *L. Civ. R.* 11.1 and 101.1(c) in filing pleadings, briefs, and other papers with the Court.

6. Plaintiffs' counsel has consented to this request and the *pro hac vice* admission of counsel.

7. Pursuant to *L. Civ. R.* 7.1(d)(4), no brief is necessary because all facts in support of this application are set forth in the Declaration of Peter E. Perkowski (which is submitted herewith), and there are no legal issues that must be briefed in connection with this application.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.

s/ Melissa Steedle Bogad

Melissa Steedle Bogad
mbogad@winston.com

Dated: August 22, 2013

WINSTON & STRAWN LLP
The Legal Center
One Riverfront Plaza, Suite 730
Newark, New Jersey 07102
(973) 848-7676
James S. Richter
Melissa Steedle Bogad

Attorneys for Defendant Hospira, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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NOVARTIS PHARMACEUTICALS :
CORPORATION, NOVARTIS : Honorable Susan D. Wigenton, U.S.D.J.
CORPORATION, and NOVARTIS AG, :
Plaintiffs, : Civil Action No. 12 CV 3967 (SDW)(MCA)
v. : [Consolidated with Civil Action Nos.
WOCKHARDT USA LLC and WOCKHARDT : 12 CV 4393, 13 CV 1028, and 13 CV 2379]
LIMITED, :
Defendants. : **DECLARATION OF PETER E.**
: **PERKOWSKI IN SUPPORT**
: **OF APPLICATION FOR ADMISSION**
: ***PRO HAC VICE***

x
NOVARTIS PHARMACEUTICALS :
CORPORATION, et al., : Civil Action No. 12 CV 4393
Plaintiffs, :
v. :
SUN PHARMA GLOBAL FZE, et al., :
Defendants. :

x
NOVARTIS PHARMACEUTICALS :
CORPORATION, : Civil Action No. 13 CV 1028
Plaintiff, :
v. :
ACTAVIS LLC, et al., :
Defendants. :

x

NOVARTIS PHARMACEUTICALS	:	x
CORPORATION,	:	Civil Action No. 13 CV 2379
Plaintiff,		:
v.	:	
ACCORD HEALTHCARE INC., et al.,	:	
Defendants.		:

PETER E. PERKOWSKI, of full age, hereby declares as follows:

1. I am a member of Winston & Strawn LLP, attorneys for Defendant Hospira, Inc. ("Hospira").
2. This Declaration is submitted in support of my application for admission *pro hac vice* in this matter.
3. I principally practice law in Winston & Strawn's Los Angeles offices which are located at 333 South Grand Avenue, Los Angeles, California 90071. I received a B.A. degree from the University of Rochester in 1992 and a J.D. degree from The George Washington University Law School in 1998. I am a member in good standing of the Bar of the State of California and have been since my admission in December 1998. I am also a member in good standing of the District of Columbia Bar and have been since my admission in May 2013.
4. The office maintaining the roll of members for the Bar of the State of California is the Office of Admissions of the State Bar of California, 180 Howard Street, San Francisco, California 94105.
5. I am a member in good standing of the Bar of the United States District Court for the Northern District of California and have been since my admission in April 2012.
6. The office maintaining the roll of members for the United States District Court for the Northern District of California is the Clerk's Office, United States District Court, Northern

District of California, Attention: Attorney Admissions, 450 Golden Gate Avenue, San Francisco, California 94102.

7. I am a member in good standing of the Bar of the United States District Court for the Southern District of California and have been since my admission in November 2007.

8. The office maintaining the roll of members for the United States District Court for the Southern District of California is the Clerk's Office, United States District Court, Southern District of California, Attention: Attorney Admissions, 880 Front Street, Suite 4290, San Diego, California 92101-8900.

9. I am a member in good standing of the Bar of the United States District Court for the Central District of California and have been since my admission in December 1998.

10. The office maintaining the roll of members for the United States District Court for the Central District of California is the Clerk's Office, United States District Court, Central District of California, Attention: Attorney Admissions, 312 North Spring Street, Room 529, Los Angeles, California 90012.

11. I am a member in good standing of the Bar of the United States District Court for the Eastern District of Texas and have been since my admission in July 2010.

12. The office maintaining the roll of members for the United States District Court for the Eastern District of Texas is the Attorney Admissions Clerk, United States District Court, Eastern District of Texas, 300 Willow Street, Room 104, Beaumont, Texas 77701.

13. I am a member in good standing of the Bar of the United States District Court for the Eastern District of Michigan and have been since my admission in March 2008.

14. The office maintaining the roll of members for the United States District Court for the Eastern District of Michigan is the Clerk's Office, United States District Court, Eastern District of Michigan, 231 West Lafayette Blvd., Detroit, Michigan 48226.

15. I am a member in good standing of the Bar of the United States Court of Appeals for the Third Circuit and have been since my admission in January 2006.

16. The office maintaining the roll of members for the United States Court of Appeals for the Third Circuit is the Clerk's Office, United States Court of Appeals for the Third Circuit, 21400 United States Courthouse, 601 Market Street, Philadelphia, Pennsylvania 19106-1790.

17. I am a member in good standing of the Bar of the United States Court of Appeals for the Fifth Circuit and have been since my admission in February 2012.

18. The office maintaining the roll of members for the United States Court of Appeals for the Fifth Circuit is the Clerk's Office, United States Court of Appeals for the Fifth Circuit, 600 S. Maestri Place, New Orleans, Louisiana 70130.

19. I am a member in good standing of the Bar of the United States Court of Appeals for the Ninth Circuit and have been since my admission in June 2002.

20. The office maintaining the roll of members for the United States Court of Appeals for the Ninth Circuit is the Clerk's Office, Attorney Admissions, United States Court of Appeals for the Ninth Circuit, P.O. Box 193939, San Francisco, California 94119-3939.

21. I am a member in good standing of the Bar of the United States Court of Appeals for the Federal Circuit and have been since my admission in August 2009.

22. The office maintaining the roll of members for the United States Court of Appeals for the Federal Circuit is the Clerk of Court, United States Court of Appeals for the Federal Circuit, 717 Madison Place, NW, Washington, D.C. 20439.

23. I am a member in good standing of the Bar of the United States Court of Appeals for the Armed Forces and have been since my admission in July 2009.

24. The office maintaining the roll of members for the United States Court of Appeals for the Armed Forces is the Admissions Clerk, United States Court of Appeals for the Armed Forces, 450 E Street, NW, Washington, D.C. 20442-0001.

25. I am a member in good standing of the Bar of the Supreme Court of the United States and have been since my admission in October 2008.

26. The office maintaining the roll of members for the Supreme Court of United States is the Clerk, Admissions Office, Supreme Court of United States, 1 First Street, NE, Washington, D.C. 20543-0001.

27. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

28. I will be associated in this matter with James S. Richter and Melissa Steedle Bogad, attorneys in Winston & Strawn's Newark, New Jersey office, who are members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey, and other members of the New Jersey Bar and the Bar of the District of New Jersey who are employed in Winston & Strawn's Newark office.

29. Hospira has requested that I be involved in its representation in this matter.

30. There is good cause for my admission *pro hac vice* in that I have particular knowledge and expertise regarding Hospira's business and the facts and legal issues presented by this matter.

31. I have never been denied admission *pro hac vice* in any jurisdiction.

32. If admitted to practice before this Court *pro hac vice*, I will submit to this Court's jurisdiction for discipline and abide by *L. Civ. R. 101.1(c)*.

33. I will make a payment of \$150.00 pursuant to *L. Civ. R. 101(c)(3)* payable to the Clerk, U.S. District Court and will pay the annual fee to the New Jersey Lawyers' Fund for

Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order.

34. Plaintiffs' counsel has consented to this application and my *pro hac vice* admission.

35. Consequently, I respectfully request that the Court grant my admission *pro hac vice*.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.



Peter E. Perkowski

Dated: August 21, 2013

WINSTON & STRAWN LLP
The Legal Center
One Riverfront Plaza, Suite 730
Newark, New Jersey 07102
(973) 848-7676
James S. Richter
Melissa Steedle Bogad

Attorneys for Defendant Hospira, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NOVARTIS PHARMACEUTICALS :
CORPORATION, NOVARTIS : Honorable Susan D. Wigenton, U.S.D.J.
CORPORATION, and NOVARTIS AG, :
Plaintiffs, : Civil Action No. 12 CV 3967 (SDW)(MCA)
v. : [Consolidated with Civil Action Nos.
WOCKHARDT USA LLC and WOCKHARDT : 12 CV 4393, 13 CV 1028, and 13 CV 2379]
LIMITED, : **ORDER GRANTING ADMISSION**
Defendants. : **OF COUNSEL *PRO HAC VICE***

NOVARTIS PHARMACEUTICALS :
CORPORATION, et al., : Civil Action No. 12 CV 4393
Plaintiffs, :
v. :
SUN PHARMA GLOBAL FZE, et al., :
Defendants. :

NOVARTIS PHARMACEUTICALS :
CORPORATION, : Civil Action No. 13 CV 1028
Plaintiff, :
v. :
ACTAVIS LLC, et al., :
Defendants. :
_____ x

NOVARTIS PHARMACEUTICALS	x
CORPORATION,	:
	: Civil Action No. 13 CV 2379
Plaintiff,	:
v.	:
ACCORD HEALTHCARE INC., et al.,	:
	:
Defendants.	:

THIS MATTER, being opened to the Court by Winston & Strawn LLP, attorneys for Defendant Hospira, Inc. (“Hospira”), for an Order allowing Peter E. Perkowski to appear and participate *pro hac vice* in this matter; and the Court having considered the papers submitted in support of said Application; and counsel for Plaintiff having consented to the *pro hac vice* admission of this attorney; and for good cause shown pursuant to *L. Civ. R. 101.1(c)*,

IT IS on this _____ day of _____, 2013,

ORDERED, as follows:

1. Peter E. Perkowski, a member of the Bars of the State of California and the District of Columbia, be and hereby is permitted to appear *pro hac vice* in the above-captioned matter pursuant to *L. Civ. R. 101.1(c)*, United States District Court for the District of New Jersey; provided, however, that all pleadings, briefs, and other papers filed with the Court shall be signed by James S. Richter or Melissa Steedle Bogad, members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of this Court, or other members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of this Court who are employed in the Newark office of Winston & Strawn LLP, who shall be held responsible for said papers and for the conduct of the case and who shall be present before the Court during all phases of this

proceeding, unless expressly excused by the Court, as well as be held responsible for the conduct of the attorney admitted *pro hac vice* pursuant to this Order.

2. Peter E. Perkowski shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order.

3. Peter E. Perkowski shall make a payment of \$150.00, pursuant to *L. Civ. R. 101(c)(3)*, payable to the Clerk, U.S. District Court.

4. Peter E. Perkowski shall be bound by the Local Civil Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of *L. Civ. R. 104.1, Discipline of Attorneys*.

5. Peter E. Perkowski shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule 1:21-7, as amended.

Honorable Madeline Cox Arleo, U.S.M.J.